

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

ROBERT ALBERT, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SIMPLE HOUSE SOLUTIONS LLC, a
Texas registered limited liability company,

Defendant.

Case No.
20-cv-
02807

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE

Plaintiff Robert Albert pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily dismisses the instant action. All claims of Plaintiff, Robert Albert, individually, are hereby dismissed with prejudice. Defendant has neither answered Plaintiff's Complaint, nor filed a motion for summary judgment. Although this case was filed as a class action, no class has been certified, and court approval of this voluntary dismissal is therefore not required under Rule 23(a) of the Federal Rules of Civil Procedure.

Dated: December 2, 2020

By: /s/ Stefan Coleman

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